

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

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**UNITED STATES OF AMERICA**

**v.**

**JAMIE EDELKIND**

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) **CRIMINAL NO.**  
) **04 – 10066 MEL**  
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**DEFENDANT JAMIE EDELKIND’S MOTION TO CONTINUE  
DATE FOR SENTENCING AND FOR A STATUS CONFERENCE**

The defendant Jamie Edelkind (“Edelkind”) is scheduled to be sentenced on June 20, 2005. Edelkind moves that the court continue the date for sentencing to a date at least two weeks after June 20, 2005. The government has indicated that it will oppose the requested continuance.

As grounds for the motion Edelkind’s counsel states that he requires additional time to prepare adequately for the sentencing. In addition, counsel for Edelkind states that on Edelkind’s behalf he has recently filed three motions that are best addressed prior to sentencing. In this connection, Edelkind suggests that a status conference would be helpful and requests that the court schedule such a conference at the earliest possible date convenient to the court. Edelkind further requests that if the court is inclined to schedule a status conference, it also order defendant’s attendance at the conference.

JAMIE EDELKIND

By his attorney,

s/ Michael J. Liston

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June 8, 2005